

September 19, 2017

Thomas J. Maziarz, Bureau Chief
Bureau of Policy and Planning
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

Re: Comments on the Draft Connecticut Statewide Freight Plan

Dear Mr. Maziarz:

The Capitol Region Council of Governments (CRCOG) has reviewed the draft Connecticut Statewide Freight Plan, prepared by the Connecticut Department of Transportation (CTDOT), and would like to offer comments on this document. CRCOG has been an active participant in the preparation of this Plan, and we appreciate the opportunity to comment on the final deliverable. Regarding the draft Statewide Freight Plan, CRCOG urges you to consider the following points:

- **Project Prioritization:** We would appreciate some clarity regarding the process of recommending projects for National Highway Freight Program funds for FFY 2017-2026. In Section 12, the ranking criteria for selecting priority freight projects do not seem to reflect the stated goals of the Statewide Freight Plan. The process for establishing these ranking criteria should be fully explained. It would also be helpful to see a full list of project scores in order to better understand the reasoning behind the selection of the three projects presented in Section 12. We feel that it is critical that such important funding recommendations be fully and transparently explained.
- **Truck Parking:** We understand that there is a shortage of truck parking facilities within Connecticut, and we support the desire to ameliorate this issue. Within the draft Statewide Freight Plan, however, there are opportunities for more details on this topic. Goal 3 of the Plan is "Optimized Operations & Performance." In an email to CTDOT on January 31, 2017, CRCOG staff suggested that "Ensure the availability of adequate truck parking facilities" be added to this objective. We still feel this is important, as identifying the need to address Connecticut's truck parking shortage as a stated objective of the Statewide Freight Plan would heighten the priority of this issue. Similarly, in reviewing the draft Plan it was surprising that though the need for more truck parking is listed as a concern that came up during truck freight interviews (page 5-3), it is not listed as being identified as a priority improvement (page 5-5). We would appreciate if CTDOT can verify that this is not an accidental omission, as truck parking is routinely cited as a top concern of truck freight operators nationwide. While we appreciate that increasing the number of truck parking areas is identified as a recommendation, the accompanying project does not include any significant details, further suggesting that fixing the truck parking shortage in Connecticut is not as much of a priority as it needs to.

- **Future Freight Coordination:** The draft Statewide Freight Plan states that one of CTDOT’s policy recommendations is to “Continue Dialog with Freight Stakeholders and Regional Partners.” While it is a step in the right direction to recommend continued coordination related to freight, it seems pertinent to outline expectations for how this coordination will be conducted and maintained over time. As such, CRCOG recommends that the Statewide Freight Plan incorporate more concrete recommendations related to future coordination efforts. Potential coordination approaches could include the creation of a Statewide Freight Committee and/or the establishment of a recurrent Statewide Freight Summit. CRCOG further recommends that future freight coordination efforts extend beyond state boundaries. Coordination with neighboring states is critical given the geographic nature of freight movements. Potential interstate coordination approaches could include multistate freight data purchases and the inclusion of representatives from neighboring states at freight meetings and summits.
- **Critical Urban and Rural Freight Network:** We understand that Connecticut’s Critical Urban and Rural Freight Network (CURFN) is purposely omitted from the draft Statewide Freight Plan so that this network can be updated more frequently than the overall Plan. We recommend, however, that the CURFN be incorporated into the Statewide Freight Plan by reference. The CURFN provides connectivity to the National Highway Freight Network (NHFN) and is therefore an important freight asset within Connecticut. It seems appropriate, therefore, to highlight both the NHFN and the CURFN in Section 6.1 (in addition to existing text in Section 4). By referencing “the most current version of the CURFN,” this network would become a part of the Statewide Freight Plan while still allowing CTDOT to make network adjustments without editing the entire Plan.

In addition to the larger topics discussed above, attached please find detailed comments and suggested edits. We appreciate the opportunity to submit our comments on this important effort, and we ask for your consideration of our comments as you proceed with developing the final Connecticut Statewide Freight Plan. If you have any questions, or if we can assist in any way to further explain our position or support you in your on-going effort regarding this Plan, please do not hesitate to contact me.

Sincerely,



Lyle D. Wray
Executive Director

cc: Ms. Colleen Kissane, Transportation Assistant Planning Director – CTDOT
Mr. David Elder, Transportation Supervising Planner – CTDOT
Mr. Jon Colman, Chair – CRCOG Transportation Committee
Ms. Jennifer Carrier, Director of Transportation – CRCOG

Attachment: Detailed Comments on Draft Connecticut Statewide Freight Plan

Detailed Comments on Draft Connecticut Statewide Freight Plan

Location	Comment
Throughout	The text switches between Connecticut DOT, Department, and CTDOT.
Throughout	Remove caps lock from call-out boxes, as this makes the text difficult to read.
Throughout	Suggest using “opportunities” instead of “issues” – for example in the title of Section 10 as well as throughout the text
Throughout	Remove instances of “.0” from numbers – for example 212.0 million tons on page 8-1, 11.0 percent by weight on page 8-3, etc.
Throughout	The symbols change between maps. For example, Figures 8.6 and 8.7 use gradations of red to show high volumes, Figure 8.13 uses red to mean 0 and then used shades of blue to show higher volumes, other maps use green, etc. Initially it seemed like the color linked to mode, but that is not consistent either. This should be standardized throughout the document.
Throughout	The abbreviation for National Highway Freight Program is shows as NHFP in some places and NFRP in others. This should be standardized.
Page i	The introduction paragraph of the Executive Summary feels a little too casual “you ordered, say, a gift”, “American know-how”, etc. The plan is referred to as “Connecticut Multimodal Freight Plan” vs. “Connecticut Statewide Freight Plan.”
Page ix	There is extraneous text between Figure 4.1 and Figure 4.2, likely due to a style error in Word.
Page 1-1, last sentence	“CTDOT’s and its partners”
Page 2-4	In addition to the federal measures for highway performance, should other modes (rail, airport, port) be measured as well?
Page 3-3, first line under Trucking heading	“ The Governor Malloy’s”
Page 3-10	It seems that the <i>Freight movement in the Hartford Metropolitan Area</i> reference should be placed under CRCOG’s head with perhaps a secondary reference under RiverCOG. This way RiverCOG can have its own heading (versus RiverCOG and CRCOG as is currently listed)
Page 3-11, top line	Extra space between for and freight-generating
Page 3-12	Heading for Connecticut Port Authority doesn’t need to say “New”
Page 4-4	It seems that sections 4.3.4 and 4.3.5 should be subsections of 4.3.3 instead of their own separate sections

Location	Comment
Section 5	Recommend moving Section 5 to just before Section 10 – feels odd to discuss challenges before understand the system itself. Stakeholder Engagement seems like a nice transition to Trends/Needs/Issues.
Page 5-2, Section 5.2	It should be noted that MPOs assisted in the identification of stakeholders
Page 5-2, Table 5-1	In one instance CRCOG is identified as Capital Region Council of Governments. CRCOG also attended interview with Gerdau Steel and should be added to the 4/11/16 meeting.
Page 5-11	Move Figure 5.1 ahead of section 5.2.3 since it deals with trucks and not rail
Page 5-13	The New England Central Railroad is listed as a bullet instead of a header
Page 5-14, first bullet	NAUG should be NECR. Recommend changing second sentence to: “With the completion of this project, the only remaining non-286k portion of this line, which connects New London, CT to Montreal, Canada, will occur in Massachusetts between TOWN and TOWN.”
Page 7-2	Change 7.2.1 title to “Business and Economic Dependence on Freight”
Page 8-1	It says Connecticut’s through traffic rate is “relatively high.” How does it compare to other neighboring/New England states?
Page 8-13, Figure 8.14	Generator labels are very hard to read
Page 8-13	How is “major truck freight generator” defined? Is there a numeric threshold or is it a more qualitative title?
Page 8-18	Call-out box is falling off page